

**LITE DEPALMA GREENBERG & AFANANDOR, LLC**

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*Attorney for Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEW JERSEY**

HEATHER ALTMAN and ELIZA WIATROSKI,  
 Individually and on Behalf of All Others Similarly  
 Situated,

*Plaintiffs,*

v.

CEASERS ENTERTAINMENT, INC.,  
 BOARDWALK REGENCY LLC d/b/a CEASERS  
 ATLANTIC CITY HOTEL & CASINO, HARRAH'S  
 ATLANTIC CITY OPERATING COMPANY, LLC  
 d/b/a HARRAH'S RESORT ATLANTIC CITY  
 HOTEL & CASINO, TROPICANA ATLANTIC  
 CITY CORPORATION d/b/a TROPICANA CASINO  
 AND RESORT ATLANTIC CITY, MGM RESORTS  
 INTERNATIONAL, MARINA DISTRICT  
 DEVELOPMENT COMPANY, LLC d/b/a  
 BORGATA HOTEL CASINO & SPA, HARD ROCK  
 INTERNATIONAL INC., SEMINOLE HARD  
 ROCK SUPPORT SERVICES, LLC, BOARDWALK  
 1000, LLC d/b/a HARD ROCK HOTEL & CASINO  
 ATLANTIC CITY, and CENDYN GROUP, LLC,

*Defendants.*

Civil Action No.: 1:23-cv-02536-KMW-EAP

**CERTIFICATION OF JOSEPH J.  
 DEPALMA IN SUPPORT OF MOTION  
 FOR *PRO HAC VICE* ADMISSIONS OF  
 VINEET BHATIA, SHAWN L. RAYMOND,  
 STEPHEN E. MORRISSEY AND  
 BENJAMIN MANNE**

I, Joseph J. DePalma, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey, a member in good standing of the bar of this Court, and a member of the firm of Lite DePalma Greenberg & Afanador, LLC,

located at 570 Broad Street, Suite 1201, Newark, NJ 07102, co-counsel for Plaintiffs Heather Altman and Eliza Wiatroski (“Plaintiffs”) in the captioned matter. As such, I have personal knowledge of the facts set forth herein.

2. I make this Certification in support of Plaintiffs’ application to admit Vineet Bhatia, Shawn L. Raymond, Stephen E. Morrissey and Benjamin Manne *pro hac vice* as counsel for Plaintiffs.

3. Vineet Bhatia is a partner with the law firm Susman Godfrey L.L.P., located at 1000 Louisiana Street, Suite 5100, Houston, Texas 77002.

4. Mr. Bhatia has advised me that he is a member in good standing of the bars of the State of Texas, State of New York, the United States District Court for the Southern District of Texas, the United States District Court for the Northern District of Texas, the United States District Court for the Eastern District of Texas, the United States District Court for the District of Columbia, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, the United States Court of Appeals for the Fifth Circuit, and the United States Court of Appeals for the Ninth Circuit. Mr. Bhatia is fully familiar with the facts of this case.

5. There is good cause for the *pro hac vice* admission of Mr. Bhatia, as he is familiar with the facts, issues and pleadings in this action and no delay in the conduct of the proceedings would be occasioned by him acting as attorney for Plaintiffs in this matter.

6. Shawn L. Raymond is a partner with the law firm Susman Godfrey L.L.P., located at 1000 Louisiana Street, Suite 5100, Houston, Texas 77002.

7. Mr. Raymond has advised me that he is a member in good standing of the bars of the State of Texas, State of Arkansas, the United States District Court for the Southern

District of Texas, the United States District Court for the Eastern District of Texas, the United States District Court for the Northern District of Texas, the United States District Court for the Western District of Texas, the United States District Court for the District of Colorado, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Fifth Circuit, the United States Court of Appeals for the Eighth Circuit, the United States Court of Appeals District of Columbia, the United States Court of Appeals for the Federal Circuit Federal Circuit, and the United States Supreme Court. Mr. Raymond is fully familiar with the facts of this case.

8. There is good cause for the *pro hac vice* admission of Mr. Raymond, as he is familiar with the facts, issues and pleadings in this action and no delay in the conduct of the proceedings would be occasioned by him acting as attorney for Plaintiffs in this matter.

9. Stephen E. Morrissey is a partner with the law firm Susman Godfrey L.L.P., located at 401 Union Street, Suite 3000 Seattle, WA 98101.

10. Mr. Morrissey has advised me that he is a member in good standing of the bars of the State of California, State of Washington, the District of Columbia, the United States District Court for the Western District of Washington, the United States District Court for the Central District of California, the United States District Court for the Northern District of California, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of Texas, the United States District Court for the Eastern District of Michigan, the United States District Court for the Northern District of Illinois, the United States District Court for the District of Colorado, the United States Court of Appeals for the Seventh Circuit, the United States Court of Appeals for the Ninth Circuit, and the United States Court of Appeals for the Tenth Circuit. Mr. Morrissey is fully familiar with

the facts of this case.

11. There is good cause for the *pro hac vice* admission of Mr. Morrissey, as he is familiar with the facts, issues and pleadings in this action and no delay in the conduct of the proceedings would be occasioned by him acting as attorney for Plaintiffs in this matter.

12. Benjamin Manne is an attorney with the law firm Susman Godfrey L.L.P., located at 401 Union Street, Suite 3000 Seattle, WA 98101.

13. Mr. Manne has advised me that he is a member in good standing of the bars of the State of Washington and the United States District Court for the Western District of Washington. Mr. Manne is fully familiar with the facts of this case.

14. There is good cause for the *pro hac vice* admission of Mr. Manne, as he is familiar with the facts, issues and pleadings in this action and no delay in the conduct of the proceedings would be occasioned by him acting as attorney for Plaintiffs in this matter.

15. Pursuant to Rule 101.1(c)(4) of the Local Civil Rules, my firm will appear in this action, including all court appearances on behalf of Plaintiffs, and agrees to accept service of all notices, orders, and pleadings in this action. I or an attorney from my firm will sign and file all pleadings, enter all appearances, sign all stipulations, and other such documents in this matter. I agree to be responsible for the conduct of the above-named counsel should they be admitted *pro hac vice*.

16. Pursuant to Rule 101.1(c)(4) of the Local Civil Rules, my firm will appear in this action, including all court appearances on behalf of Plaintiffs, and agrees to accept service of all notices, orders, and pleadings in this action. I or an attorney from my firm will sign and file all pleadings, enter all appearances, sign all stipulations, and other such documents in this matter. I agree to be responsible for the conduct of the above-named counsel should they be

admitted *pro hac vice*.

17. I will make certain that each attorney to be admitted *pro hac vice* in this case will comply with Local Civil Rule 101.1(c).

18. Accordingly, I respectfully request that this Court enter an Order admitting Vineet Bhatia, Shawn L. Raymond, Stephen E. Morrissey and Benjamin Manne *pro hac vice* in this action.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: July 20, 2023

/s/ Joseph J. DePalma  
Joseph J. DePalma